

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA	)	
	)	
v.	)	CRIMINAL NO. 1:25cr156
	)	
NATHAN VILAS LAATSCH,	)	
	)	
Defendant.	)	

GOVERNMENT’S MOTION TO CERTIFY  
CASE AS “COMPLEX” UNDER THE SPEEDY TRIAL ACT

The United States requests the Court to certify this case as “complex” under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(B)(ii), and to refrain from setting a trial date until at least the status hearing presently set for July 23, 2025.

Section 3161(h)(7)(B)(ii) enables the Court to schedule the trial of this case beyond the 70-day time limit of the Speedy Trial Act when “. . . the case is so unusual or so complex, due to the number of defendants, the nature of the prosecution, or the existence of novel questions of fact or law, that it is unreasonable to expect adequate preparation for pretrial proceedings or for the trial itself within the time limits established by this section.”

In this case, the defendant is charged with attempting to transmit to a foreign government information relating to the national defense. In light of the charge, the United States anticipates that this case will involve classified information, which will require defense counsel to obtain clearances, and likely result in proceedings pursuant to the Classified Information Procedures Act (“CIPA”), Title 18, United States Code, App. III. Further, prosecution of the case will require coordination with elements of the United States intelligence community, in order to

determine which portion(s) of the information stolen by the defendant will be designated, as materials upon which the United States will rely at trial.

In light of these factors, the United States requests that the Court certify the case as “complex,” and further find that the ends of justice served by scheduling a trial date beyond the 70-day deadline of the Speedy Trial Act outweigh the best interests of the public and the defendants in a speedy trial. Postponement of the selection of a trial date until the status conference presently scheduled for July 23, 2025, should allow the parties sufficient time to prepare for trial in light of the considerations set forth above.

Respectfully submitted,

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United States Attorney

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